

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

UNITED BROTHERHOOD OF
CARPENTERS AND JOINERS OF
AMERICA, an unincorporated
association, and PACIFIC
NORTHWEST REGIONAL
COUNCIL OF CARPENTERS, an
unincorporated association,

Plaintiff[sic],

v.

EVELYN SHAPIRO, an individual,

Defendant.

Case No.: 2:22-cv-00245-TSZ

SUPPLEMENTAL DECLARATION OF
EVELYN SHAPIRO IN SUPPORT OF HER
ANTI-SLAPP MOTION TO DISMISS
PLAINTIFFS' COMPLAINT PURSUANT
TO RCW 4.24.510, RCW 4.105.020, AND
NOERR-PENNINGTON IMMUNITY

I, EVELYN SHAPIRO, make the following statement under oath subject to penalty of
perjury under the laws of the United States and the State of Washington:

1.1 My name is Evelyn Shapiro-O'Connor. I am over the age of eighteen and am competent
to testify in these proceedings. My testimony is based upon my personal knowledge, and my
education, training, and experience.

1 1.2 I make this statement in support of my Anti-SLAPP Motion to Dismiss Plaintiffs'
2 Complaint Pursuant to RCW 4.24.510, RCW 4.105.020, and *Noerr-Pennington* Immunity.

3 1.3 For purposes of clarification, my communications with the National Labor Relations
4 Board pre-dated plaintiffs filing the complaint against me. I was identified as a supporting
5 witness for other claimants and have been in communication with the investigator prior to filing
6 my individual complaint.
7

8 1.4 With regard to plaintiffs' contention that I "resigned" because I was caught has no basis
9 in reality. The statement Shanley made to me after accusing me was something like "Resign or
10 you are fucking fired." Previously he had told me multiple times in reference to the Trusteeship,
11 "Don't cross Doug [McCarron] or it'll be lethal." I feared for my safety and the safety of my
12 family because Shanley threatened me and it was clear that he and McCarron were conspiring to
13 harm me.
14

15 1.5 When I figured out what they were doing, I wanted as far away from them as I could get,
16 which meant I was out of a job. I did not resign voluntarily and I did not resign because I was
17 guilty of anything. I feared for my life and my livelihood.
18

19 DATED this 27th day of May, 2022 at Burien, WA.
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23 *Evelyn Shapiro O'Connor*
24 Evelyn Shapiro
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CERTIFICATE OF SERVICE

I, Francis Muniz-Nava, hereby certify as follows:

I am over the age of 18, a resident of Pierce County, and not a party to the above action. On May 27, 2022, I electronically filed the above SUPPLEMENTAL DECLARATION OF EVELYN SHAPIRO, with the Clerk of the Court using the Pacer CM/ECF e-filing system which will send notification of such filing to all counsel of record who receives CM/ECF notification.

I certify under penalty of perjury under the laws of the State of Washington that the above information is true and correct.

DATED this 27th day of May, 2022 at Fircrest, Washington.



Francis Muniz-Nava, Legal Assistant